

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT DAYTON

UNITED STATES OF AMERICA	:	Case No.: 3:18CR032(6)
	:	
Plaintiff,	:	JUDGE THOMAS M. ROSE
	:	
vs.	:	RESPONSE IN OPPOSITION TO
	:	DEFENDANT'S MOTION FOR
CHANDRA D. HARMON	:	TEMPORARY RETURN OF PASSPORT
	:	AND TRAVEL RESTRICTIONS (R. 165)
Defendant.	:	
	:	

Plaintiff United States of America, by and through its counsel of record, the United States Attorney's Office for the Southern District of Ohio, hereby files its response in opposition to defendant's motion for temporary return of passport and travel restrictions (R. 165). **CHANDRA D. HARMON** requests that she be permitted to travel to Hungary and Germany from August 2, 2019 through August 11, 2019. A memorandum in support of the government's position follows.

DATED: May 8, 2019

Respectfully submitted,

BENJAMIN C. GLASSMAN
United States Attorney

s/Amy M. Smith
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MEMORANDUM

A Criminal Complaint (R. 1) was filed and an Arrest Warrant (R. 2) was issued on February 27, 2018. **CHANDRA D. HARMON** was arrested in Kentucky on February 28, 2018 and appeared before Magistrate Judge Ovington for an initial appearance and a detention hearing on March 6, 2018. At that hearing, Pretrial Services recommended release and **CHANDRA D. HARMON** was placed on bond (R. 8) by Magistrate Judge Ovington. On March 13, 2018, **CHANDRA D. HARMON** was indicted on one count of aiding and abetting while using intimidation, threats, and corruptly persuading another person, or attempting to do so, and engaging in misleading conduct toward another person with the intent to influence, delay, and prevent the testimony of any person in an official proceeding with regard to evidence, in violation of 18 U.S.C. §§ 1512(b) and 2 in conjunction with the death of Robert Caldwell. (R. 20).

Based upon the seriousness of the indicted offense and the fact she resides outside this judicial district together with the absence of any identifiable change in circumstances impacting the statutory factors set forth under 18 U.S.C. § 3142(g), the government respectfully opposes the temporary return of **CHANDRA D. HARMON's** passport and opposes any modification of the current bond conditions.

DATED: May 9, 2019

Respectfully submitted,

BENJAMIN C. GLASSMAN
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s/Amy M. Smith
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the attached Response in Opposition was electronically filed and served upon Timothy Schneider, Esq, via the CM/ECF system on this 9th day of May, 2019.

s/Amy M. Smith

AMY M. SMITH

Assistant United States Attorney